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District of Oregon  
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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**MEDFORD DIVISION**

**UNITED STATES OF AMERICA,**

**Case No. 1:19-cv-00846-BR**

**Plaintiff,**

**COMPLAINT**

**v.**

**2562 Sibley Drive, Atlanta, Georgia, *in rem*,**

**Defendant.**

Plaintiff, United States of America, by Billy J. Williams, United States Attorney for the District of Oregon, and Amy E. Potter, Assistant United States Attorney, for its complaint *in rem* for forfeiture, alleges:

**I.**

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 18 U.S.C. § 981; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

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COMPLAINT *in rem* FOR FORFEITURE

Page 1

II.

Defendant, *in rem*, 2562 Sibley Drive, Atlanta, Fulton County, District of Northern Georgia, State of Georgia, real property with buildings, appurtenances, and improvements, (hereinafter known as Sibley Drive) and more particularly described as:

All that tract or Parcel of land lying and being in land lot 6, 17th district, Fulton County, Georgia, being known as lot 35, Buckhead Park at Lenox Subdivision, as per plat recorded at plat book 369, page 103-105, Fulton County, Georgia records and designated as 2562 Sibley Drive, Atlanta GA 30324. Said Plat being incorporated herein by reference thereto

is now and during the pendency of this action will be within the jurisdiction of this Court.

III.

Defendant, *in rem*, Sibley Drive constitutes or is derived from, proceeds traceable to 18 U.S.C. § 1343 (Wire Fraud), 18 U.S.C. § 1341 (Mail Fraud), 18 U.S.C. § 1344 (Bank Fraud), 18 U.S.C. § 1028 (a)(7) (Identity Theft), and 18 U.S.C. § 1929 (Access Device Fraud) and is forfeitable to the United States pursuant to the provisions of 18 U.S.C. § 981(a)(1)(C), as more particularly set forth in the declaration of Special Agent Amy Blaser, Internal Revenue Service – Criminal Investigations, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, plaintiff, United States of America, prays that due process issue to enforce the forfeiture of defendant, *in rem*, Sibley Drive; that due notice be given to all interested persons to appear and show cause why forfeiture of this defendant, *in rem*, should not be decreed; that due proceedings be had thereon; that this defendant be forfeited to the United

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States; that the plaintiff United States of America be awarded its costs and disbursements incurred in this.

Respectfully submitted this 31st day of May 2019.

BILLY J. WILLIAMS  
United States Attorney

s/ Amy E. Potter  
AMY E. POTTER  
Assistant United States Attorney

**VERIFICATION**

I, Amy Blaser, declare under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with the Internal Revenue Service-Criminal Investigations, and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

s/Amy Blaser

Special Agent Amy Blaser

Internal Revenue Service-Criminal Investigations

## **DECLARATION of AMY BLASER**

I, Amy Blaser, do hereby declare:

### **BACKGROUND/EXPERIENCE**

1. I am a Special Agent of the Internal Revenue Service Criminal Investigations (IRS-CI) assigned to the Medford, Oregon Post of Duty, and have been so employed since 2002. As a Special Agent, I investigate possible violations of the Internal Revenue Code (Title 26 United States Code), the Money Laundering Control Act (Title 18 United States Code), the Bank Secrecy Act (Title 31 United States Code), and other criminal violations.

### **PURPOSE OF THIS DECLARATION**

2. This declaration is submitted for purposes of seeking *in rem* forfeiture of real property located at 2562 Sibley Drive, Atlanta, Georgia (Sibley Drive), and legally known as

All that tract or Parcel of land lying and being in land lot 6, 17<sup>th</sup> district, Fulton County, Georgia, being known as lot 35, Buckhead Park at Lenox Subdivision, as per plat recorded at plat book 369, page 103-105, Fulton County, Georgia records and designated as 2562 Sibley Drive, Atlanta GA 30324. Said Plat being incorporated herein by reference thereto

purchased and controlled by Adebisi Oduneye (Oduneye), which represents Oduneye's proceeds from violations of 18 U.S.C. §1341 (Mail Fraud), 18 U.S.C. §1343 (Wire Fraud), 18 U.S.C. §1344 (Bank Fraud), 18 U.S.C. § 1028(a)(7) (Identity Theft), and 18 U.S.C. § 1029 (Access Device Fraud), thereby subjecting the real property to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C).

3. The information contained in this declaration is based on my personal knowledge, as well as information obtained from other law enforcement personnel and cooperating witnesses. The information set forth here is provided solely for the purpose of establishing

probable cause in support of the seizure and therefore, it does not set forth each and every fact that I or others have learned during the course of this investigation.

### **SUMMARY OF THE INVESTIGATION**

4. Beginning in 2013, IRS Criminal Investigations (IRS-CI) began an investigation into the filing of false federal and Oregon state tax returns. As part of this investigation, numerous federal search warrants were executed, including e-mail and instant message (IM) warrants for the communications of Oduneye and co-conspirators, including his adebiyioduneye@xxxx, paworkerjob@xxxx, and eleda108@xxxx email aliases.

5. Based on evidence obtained in this investigation, including Oduneye's emails and instant messenger communications; financial declarations from U.S. government agencies; federal and state tax return information; bank records; prepaid debit card records; Western Union wire transfers; and witness statements, there is probable cause to believe, and I do believe, that beginning in at least 2012 and continuing until at least May 2015, Oduneye engaged in a scheme with other co-conspirators, known and unknown at this time, to utilize stolen identity information to prepare fraudulent federal and state tax returns in these victims' names.

6. On May 7, 2015, five defendants were indicted in the District of Oregon, *see United States v. Kazeem, et al.*, 1:15-cr-00172-AA (ECF No. 3), based on their participation in this scheme. Four defendants pled guilty and one defendant was convicted at trial of mail fraud, wire fraud, aggravated identity theft, and conspiracy charges. Another round of indictments were then sought and on September 6, 2018, Oduneye and Oluwole Odunowo, a co-defendant with whom he communicated via his email aliases, were indicted in the District of Oregon, *see United States v. Oduneye, et al.*, 1:18-cr-00409-MC (ECF No. 1), for violations of 18 U.S.C. §§ 1341, 1028A, and 1349, related to the identity theft and tax fraud scheme.

7. In total, Oduneye filed over 2,900 accepted fraudulent federal returns seeking over 26 million dollars in fraudulent refunds. The actual loss exceeded 4.75 million dollars in refunds. Oduneye left the United States for Nigeria on May 13, 2015, the same day search warrants were executed on multiple locations in Georgia and Maryland. There is no evidence Oduneye has returned to the United States and there is currently a warrant for his arrest.

### **Fraud Scheme**

8. In May 2013, a Medford, Oregon, victim reported to IRS Criminal Investigations (IRS-CI) that false federal and Oregon tax returns were filed electronically in her and her husband's names. The returns contained the victims' accurate Personal Identification Information (PII) including their social security numbers and dates of birth.

9. The false federal return with the Medford victims' stolen PII directed IRS to deposit the refund into an account associated with a prepaid debit card purchased in a suburb of Chicago, IL, while the false state return was directed to a bank account in Texas. IRS-CI eventually identified the purchaser of the debit card (hereafter referred to as the "Chicago co-conspirator"), and executed a search warrant on his residence. During that search, agents seized around 150 prepaid debit cards along with approximately \$50,000 worth of money orders. Agents learned that the Chicago co-conspirator purchased the prepaid debit cards for an identity scheme run out of Lagos, Nigeria since at least 2011. The Chicago co-conspirator only corresponded by email/instant message (IM) with his Nigerian contact, email moniker "queen\_jennn." Queen\_jennn instructed him on the type of card to purchase and how many to buy. He provided the card numbers to queen\_jennn. The fraudulent refunds were deposited onto the cards and he withdrew the funds, taking his 10-20% cut. He wired the remaining funds to Nigeria and/or

purchased money orders that he mailed to addresses throughout the United States, including Marietta, Georgia, where several of the defendants lived.

10. Agents determined through a review of the email/IM account of queen\_jennn that there was an exchange of stolen PII with email/IM account Lolad\_pop@xxx.com, eventually identified as belonging to co-defendant Lateef Animawun. The email/IM account included the PII and filing information of the original Medford, Oregon victims. The execution of subsequent email/IM search warrants and an analysis of the information from those accounts identified other defendants along with the extensive communication between them and other co-conspirators regarding various aspects of the scheme to defraud. The defendants owned and operated accounts identified with specific email/IM monikers, among others:

- Emmanuel Kazeem: Philipe1212@xxx.com and Princephilipe1212@xxx.com;
- Oluwatobi Dehinbo: knightyngale@xxx.com;
- Oluwaseunara Osanyinbi: oluwaseunara@xxx.com;
- jacksontommy101@xxx.com;
- Michael Kazeem: Ed.thm87@xxx.com and micjoh94@xxx.com;
- Oluwamuyiwa Olawoye: Macktomson20@xxx.com;

11. On May 13, 2015, agents executed search and/or arrest warrants at the residences and on the vehicles of the defendants in Maryland and Georgia. The search warrants resulted in the seizure of over 50 electronic devices, more than 40 money orders of over \$29,000, over \$14,000 in cash, and numerous Green Dot<sup>1</sup> prepaid debt cards with over \$12,000 in fraudulent tax refunds remaining on them. Oduneye did not have a warrant for his arrest and travel records show that on May 13, 2015, he boarded a plane to Lagos, Nigeria and has not returned to the United States.

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<sup>1</sup> Green Dot prepaid debit cards are issued by Green Dot Bank, Member FDIC.



12. After reviewing email search warrant content, interviews of witnesses, and the response to third-party records, Oduneye was linked to email monikers adebiyioduneye@xxxx; paworkerjob@xxxx, and eleda108@xxxxxx. Additional email search warrants were executed on September 24, 2015, which included these accounts. The email content from the September 2015 search warrant, along with the content captured in prior email search warrants, show Oduneye possessed over 48,000 stolen identities. A review and initial analysis of his email accounts revealed that Oduneye received and distributed large amounts of stolen PII to other co-conspirators. The emails also showed that Oduneye worked with co-defendant Oluwole and co-conspirators in various aspects of the scheme to ensure their success in gaining fraudulent tax refunds.

13. A detailed review and analysis of thousands of communications from the seized email/IM accounts in conjunction with thousands of records from IRS, debit card companies, internet providers, tax software companies, money transfer companies, etc. revealed the complex nature of the scheme necessary to successfully participate in it and obtain millions of dollars of fraudulently obtained funds. The scheme to defraud included acquiring and disbursing stolen PII, “washing” stolen PII, utilizing that information to acquire IRS electronic filing PINs in the taxpayer’s name and the necessary pre-paid debit cards with the stolen PII (all used in conjunction with the electronic filing of the fraudulent tax returns), obtaining the fraudulent refunds on prepaid debit cards like Green Dot, withdrawing of those funds, and disposing of the funds through various means including wiring them to Nigeria.

### **Income Sources**

14. Oduneye filed joint U.S. Individual Income Tax Returns for 2011, 2012, and 2013 with his American wife, Edda Oduneye. Oduneye is not listed on any federal tax returns after

2013. Tax returns from 2011-2013 show Oduneye did not report income from any sources; his occupation is left blank or indicates he is “unemployed.” Edda Oduneye reported the following income working as a paralegal:

- 2011 \$9,988 of taxable income
- 2012 \$34,733 of taxable income
- 2013 \$38,692 of taxable income

15. Oduneye’s immigration file lists his employment from 2012 through January of 2014 as an office manager with “Buckhead,” with no income amount listed. The IRS shows no records of employment for Oduneye from 2011 through 2015.

16. Although no domestic or foreign income sources were found for the 2011-2015 tax years, Western Union money transfer control numbers found in Oduneye’s email accounts tied him to over 790 wire transfers with over \$750,000 in suspected fraudulent tax proceeds during this same time period. In addition, subpoenaed records from Bank of America show that from 2012 through 2014 there were multiple cash deposits totaling over \$400,000 in Oduneye’s personal bank account.

17. A review of the email accounts linked to Oduneye showed hundreds of prepaid debit card numbers in his possession. A subpoena to Green Dot Bank revealed the debit cards linked to these numbers were registered in identity theft victims’ names. Many of the prepaid debit cards already had the fraudulent tax refunds withdrawn. However, some of the debit cards, primarily the ones loaded with tax refunds just before Oduneye left the U.S., had balances totaling over 1 million dollars. Oduneye departed the United States before the funds were pulled off the prepaid debit cards. The IRS is currently in the process of recouping those funds from Green Dot Bank.

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**Expenditures**

18. Bank records and credit card statements were obtained from grand jury subpoenas to Bank of America, American Express, and Capital One Bank. These records show Oduneye made the following expenditures during the fraud scheme from 2012 through 2015:

- Charges of over \$120,000 on credit cards in Oduneye's name
- Cash withdrawals of over \$200,000 from one of Oduneye's personal Bank of America checking accounts.

19. Georgia DMV records show Oduneye had two vehicles registered in his name:

- A 2015 Mercedes S550
- A 2011 Mercedes GLK350.

**Purchase of Sibley Drive Property**

20. Email search warrant records show that on February 3, 2014, Oduneye, using email address adebiyioduneye@xxxx, corresponded with co-conspirator blacks2008@xxxx regarding the purchase of the 2562 Sibley Dr. property. In the email, Oduneye asks blacks2008 to pick up his mother every day to do wire transfers that do not surpass \$10,000. Oduneye states "she will do you will do my sister will do and wole go do to." Attached to the email is Blackburn Adair LLC wire instructions.

<b>From:</b>	adebiyi oduneye <adebiyioduneye@yahoo.com>
<b>Sent:</b>	Monday, February 03, 2014 2:52 PM
<b>To:</b>	blacks2008@yahoo.com
<b>Subject:</b>	for crib print out Make MEMO on EACH TRASFER FOR HOUSE NO 35 AND KEEP ALL RECEIPT
<b>Attachments:</b>	Blackburn _ Adair wire instructions 3-21-2012.pdf

BABA Pick MY MUM Everyday BIKO TO BANK AND TO DO TRANSFER na 400 una go do but you knw daily each person No fit do pass 10k she will do you will do my sister will do to and wole go do to

21. On February 7, 2014, co-defendant Oluwole Odunowo (often referred to as "Wole"), using email account odunsng@xxxx, instant messages Oduneye a wire transfer receipt showing

\$10,000 being sent from Odunowo Oluwole to Blackburn and Adair LLC on February 5, 2014 and again on February 6, 2014.

<b>From:</b>	Wole Odus <odunsng@yahoo.com>
<b>Sent:</b>	Friday, February 07, 2014 1:10 PM
<b>To:</b>	eleda108@yahoo.com
<b>Subject:</b>	<ding>
<b>Follow Up Flag:</b>	Follow up
<b>Flag Status:</b>	Flagged
<p>odunsng(21:08:10 (UTC)):&lt;ding&gt;  odunsng(21:08:53 (UTC)):05-Feb-2014 1114030576 SWIFT TRANSFER FX TRF-ODUNOWO OLUWOLE OLUWASEUN/BLACKBURN AND ADAIR LLC - IOLTA 05-Feb-2014 10,000.00 View Cheque Image View Transaction Receipt 305  odunsng(21:09:43 (UTC)):06-Feb-2014 1114031820 SWIFT TRANSFER FX TRF- ODUNOWO O. OLUWASEUN/BLACKBURN AND ADAIR LLC-IOLTA 06-Feb-2014 10,000.00 View Cheque Image View Transaction Receipt 305  odunsng(21:09:48 (UTC)):&lt;ding&gt;</p>	

22. Records from First Citizen Bank show that from February 5, 2014, through February 19, 2014, approximately 38 wires between \$9,975 and \$10,000, totaling \$379,675, were sent from Nigeria to the IOLTA account of Blackburn and Adair LLC for the benefit of “Oduneye House 35.” These wires had several Nigerian originators: Olumuyiwa Egunjobi (sending \$70,000), Adedayo Oduneye (sending \$39,925), Adetayo Oyemade (sending \$69,875), Oduneye (sending \$69,875), and co-defendant Oluwole Odunowo (sending \$130,000). In addition, a \$30,040 check was sent from Edda Oduneye using a SunTrust Bank Account. Records indicate the \$30,040 originated from cash deposits into the SunTrust account.

23. On or around February 24, 2014, Oduneye purchased property located at 2562 Sibley Drive, Atlanta, GA for \$450,000. A title report shows the 2562 Sibley Dr. property has no mortgage holder. Approximately 3 months later, on May 21, 2014, Oduneye transferred the 2562 Sibley Dr. property to Bolanle Bintu Oduneye for \$1.00 using a Quit Claim Deed.

24. Oduneye's Nonimmigrant Visa Application dated in June 2009 listed his mother as Bola Oduneye and father as Adewale Oduneye. Bolanle Bintu Oduneye's (Bola) U.S. State Department records show she submitted two CEAC DS-160 Visa Applications, the first one in June 2015 and a second one in August 2015. Bola's June 2015 Visa Application states she would like to visit her son and claims she has a house in the U.S. Bola lists her child as Adebiyi Oduneye, a U.S. Citizen. The address where Bola would stay is listed as 2562 Sibley Dr. NE, Atlanta Georgia. Bola's second Visa Application, in August of 2015, states she would like to come to the U.S. to comfort her son. Again, Oduneye's name and phone were listed as Bola's U.S. contact. Both of Bola's Visa Applications were submitted after Oduneye left the United States, with no record of him returning. Bola's 2015 requests to enter the U.S. were denied. However, Bola's VISA Applications show she is the mother of Oduneye.

### **CONCLUSION**

25. Based on the foregoing, I have probable cause to believe, and I do believe, that Oduneye and others were involved in a conspiracy to commit mail fraud, wire fraud, bank fraud, identity theft, and access device fraud, in violation of 18 USC §§ 1341, 1343, 1344, 1028(a)(7), and 1029 from at least 2012 through May 2015. During the scheme, Oduneye was found to have no verifiable income sources, yet he made extensive expenditures, including the purchase of luxury vehicles and property. Oduneye is linked to over \$775,000 in funds going to Nigeria via Western Union transfers and over \$400,000 in cash deposits at Bank of America. In addition, Oduneye caused approximately \$379,675 to be wired from Nigeria to the U.S. for the purchase of 2562 Sibley Dr., Atlanta, GA. Three months after Oduneye purchased the Sibley Drive property; it was transferred to Bolanle Oduneye, an individual believed to be his mother, for \$1. None of the funds used to purchase the Sibley Drive property appear to originate from Bolanle

Oduneye. Therefore, it is believed that the funds used by Oduneye to purchase the Sibley Drive property were in fact proceeds of the crime and that the transfer of the property was not an arm's length transaction, making the real property subject to forfeiture.

26. The Sibley Drive property represents the proceeds of violations of 18 U.S.C. §1341 (Mail Fraud), 18 U.S.C. §1343 (Wire Fraud), 18 U.S.C. §1344 (Bank Fraud), 18 U.S.C. § 1028(a)(7) (Identity Theft), and 18 U.S.C. § 1029 (Access Device Fraud), thereby subjecting the real property to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C).

I declare under penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. §1746.

Executed this 31st day of May, 2019.

s/Amy Blaser  
Amy Blaser  
Special Agent  
Internal Revenue Service-Criminal Investigations

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS**

United States of America

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Amy E. Potter - United States Attorney's Office  
405 E. 8th Street, Suite 2400, Eugene OR 97401-2708

**DEFENDANTS**

2562 Sibley Drive, Atlanta, Georgia, in rem

County of Residence of First Listed Defendant **Fulton, GA**  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE  
LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff  
☐ 2 U.S. Government Defendant  
☐ 3 Federal Question (U.S. Government Not a Party)  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   |                            |                            |  |                            |                            |
|---|----------------------------|----------------------------|--|----------------------------|----------------------------|
|   | <b>PTF</b>                 | <b>DEF</b>                 |  | <b>PTF</b>                 | <b>DEF</b>                 |
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated <i>or</i> Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated <i>and</i> Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation   | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input checked="" type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	
			<b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

**V. ORIGIN**

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from another district (specify) \_\_\_\_\_  
☐ 6 Multidistrict Litigation  
☐ 7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

18 U.S.C. § 981(a)(1)(C)

Brief description of cause:

Forfeiture of property which constitutes or is derived from proceeds of fraud

**VII. REQUESTED IN COMPLAINT:**CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 ☐

DEMAND \$ \_\_\_\_\_

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE \_\_\_\_\_

DOCKET NUMBER \_\_\_\_\_

DATE

SIGNATURE OF ATTORNEY OF RECORD

5/31/2019

s/ Amy E. Potter

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_